REMARKS

Claims 1-24 are pending in the present application. Reconsideration of the claims is respectfully requested.

I   35 U.S.C. § 112, First Paragraph

The Examiner rejected Claims 6, 14 and 22 under 35 U.S.C. § 112, first paragraph. Additionally, the examiner rejected the claims under the same reasons. This rejection is respectfully traversed.

In rejecting Claim 6 (and Claims 14 and 22), the Examiner states that the claim limitation "by a user who issued the user logoff" is unclear, and thus not enabled.

Applicants urge that Specification support for Claim 6 is at Specification page 13, lines 2 -14 and lines 21-22 and depicted in Figure 3, blocks 314-320. There, if a user logout is received the current security context is destroyed and a reversion is made to use the (previously) saved security context if aggregation is enabled. This allows a given user to login using different security contexts (Specification page 2, lines 12-20; page 3, lines 8-20). Thus, when the reversion is made to use the (previous) saved security context, the user who issued the logoff from the second context is able to continue to use the first context that existed prior to the second context being created. It is thus urged that the Specification does describe the features recited in Claim 6, and thus Claim 6 is enabled by the Specification.

Therefore, the rejection of Claims 6, 14 and 22 under 35 U.S.C. § 112, first paragraph has been overcome.

II.   35 U.S.C. § 103, Obviousness

The Examiner rejected Claims 1-24 under 35 U.S.C. § 103 as being unpatentable over Savill (Where can I find a Unix su like utility?) and in view of Wu (U.S. Patent Number 5,774,551), hereinafter referred to as Wu. This rejection is respectfully traversed.

With respect to Claim 1, Applicant's urge that Wu's stacking of authentication services is *not* done *in response to a second user authentication*, but rather is pre-existing and independent of any actual user authentication action. Importantly, Wu expressly teaches away from a second user authentication, or of performing any action in response to such (missing) second user

authentication, by its teaching of a *unified, single user login*. See, for example, Wu's discussion at col. 3, lines 11-14, where it states:

> "It is also desirable to provide a system and method where user is able to employ a single authentication token with any number multiple authentication services to obtain a unified login." (emphasis added by Applicants)

Because of this expressed desire by Wu to provide a *single authentication token* for accessing any number of multiple authentication services in order to obtain a unified (single) login, there would have been no reason or other motivation for Wu to perform any action in response to receiving a *second* user authentication (in addition to the first user authentication). Thus, there would have been no reason or other motivation to modify the teachings of the cited references to generate a second security context *in response to a second user authentication*, where this second security context is *an aggregate of* (i) said first security context and (ii) a security context *corresponding to an identity in said second user authentication*, as Wu abhors any type of such second user authentication. It is error to reconstruct the patentee's claimed invention from the prior art by using the patentee's claims as a "blueprint". When prior art references require selective combination to render obvious a subsequent invention, there must be some reason for the combination other than the hindsight obtained from the invention itself. *Interconnect Planning Corp. v. Feil*, 774 F.2d 1132, 227 USPQ 543 (Fed. Cir. 1985). When an obviousness determination is based on multiple prior art references, there must be a showing of some "teaching, suggestion, or reason" to combine the references. "...absence of such suggestion to combine is dispositive in an obviousness determination", *Gambro Lundia AB v. Baxter Healthcare Corp.*, 110 F.3d 1573, 42 USPQ2d 1378 (Fed. Cir. 1997). Because of Wu's expressed desire to eliminate any need for a second user authentication – instead providing a unified login with a single user token – there would have been no motivation to one of ordinary skill in the art to modify the teachings of the cited references to generate an aggregate security context (the aggregate security context being an aggregate of (i) the first security context which

was generated in response to a first user authentication, and (ii) a security context corresponding to an identity in the (missing) second security context) *in response to* a (missing) second security context.

Applicants traverse the rejection of Claims 2-24 for similar reasons to those given above with respect to Claim 1.

Further with respect to Claim 6 (and similarly for Claims 14 and 22), a prima facie case of obviousness has not been properly established. Claim 6 expressly recites "reverting to said first security context in response to a user logoff, wherein said first security context is then used to access security protected resources by a user who issued the user logoff". In rejecting Claim 6, the Examiner points to the teachings of Saville lines 1-5 as teaching this claimed feature. Applicants urge that Saville expressly teaches away from the features of Claim 6, as Saville describes a special command that can be used to launch an application at a different security level than the one that currently exists, *in order to avoid* a user having to logoff their current security context and re-login with a different security context. This special launching of an application, and as described at lines 4-5, is performed by a SU command. This SU command is a utility that allows a user to temporarily start applications running in the security context of a different account (Saville lines 4-5), and *avoids the user from having to logoff* (line 4). Thus, Saville expressly teaches away from the features of Claim 6, by teaching a technique that *avoids logoff*. In contrast, Claim 6 is explicitly directed to an action (reverting to the first security context) *in response to a user logoff*. Thus, it is urged that a proper prima facie case of obviousness has not been established by the Examiner as there are missing claimed features not taught or suggested by any of the cited references. Thus, Claim 6 is shown to have been erroneously rejected.
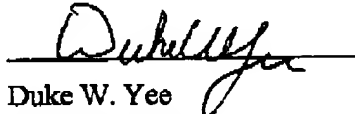
Therefore, the rejection of Claims 1-24 under 35 U.S.C. § 103 has been overcome.

III.   Conclusion

It is respectfully urged that the subject application is patentable over the cited references and is now in condition for allowance. The Examiner is invited to call the undersigned at the below-listed telephone number if in the opinion of the Examiner such a telephone conference would expedite or aid the prosecution and examination of this application.

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Respectfully submitted,

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